

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Earle Stanley Greer		: Bankruptcy No. 18-18146-elf
Debtor		: Chapter 13
		:
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STONEHEDGE FUNDING, LLC, Movant		: vs.
		: Hearing on <u>04/30/2019</u> at <u>9:30 am</u>
		: in Courtroom <u>1 (Nix)</u>
EARLE STANLEY GREER, Debtor		:
and		:
WILLIAM C. MILLER Trustee		: 11 U.S.C. § 362


**CERTIFICATION OF NO RESPONSE TO MOTION FOR
RELIEF FROM STAY FILED BY
STONEHEDGE FUNDING, LLC
AND REQUEST FOR ENTRY OF COURT ORDER**

The undersigned, Robert S. Esposito, Esquire, attorney for Stonehedge Funding, LLC, ("Stonehedge") hereby certifies as follows:

1. Stonehedge filed a Motion for Relief from Automatic Stay to Allow Enforcement of its Mortgage on Premises 2216 S. 69th Street, Philadelphia, Pennsylvania 19442 in the present bankruptcy proceedings on April 5, 2019.
2. On the same date, true and correct copies of this Motion, together with all supporting exhibits and documents, and together with Stonehedge's Notice of Motion, Response Deadline and Hearing Date, were served on all parties in interest.
3. No answer or other responsive pleading has been received by the undersigned to date, whereupon the Debtor is now in default of the requirements imposed by the above Notice.

WHEREFORE, the undersigned respectfully requests the Court to enter an Order modifying the stay in the form attached to Stonehedge's Motion for Relief.

Date: 04/27/2019



ROBERT S. ESPOSITO, ESQUIRE
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Attorney for Stonehedge Funding, LLC

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In Re:	Earle Stanley Greer	:	Bankruptcy No. 18-18146-elf
	Debtor	:	Chapter 13
		:	
STONEHEDGE FUNDING, LLC, Movant		:	
	vs.	:	Hearing on <u>04/30/2019</u> at <u>9:30 am</u>
		:	in Courtroom <u>1 (Nix)</u>
EARLE STANLEY GREER,	Debtor	:	
and		:	
WILLIAM C. MILLER	Trustee	:	11 U.S.C. § 362

**CERTIFICATION OF SERVICE OF
REQUEST FOR COURT ORDER**

I, ROBERT S. ESPOSITO, ESQUIRE, attorney for Stonehedge Funding, LLC, certify that true and correct copies of Stonehedge's Certification of No Response to Motion for Relief from Stay and Request for Entry of Order were served on those listed and in the manner listed below on April 27, 2019:

Earle Stanley Greer
3 Carriage Lane
Lansdowne, PA 19050
Debtor, Pro.Se.
Via U. S. First Class Mail

William C. Miller, Esquire
P. O. Box 1229
Philadelphia, PA 19105
Chapter 13 Trustee
Via Court CM/ECF Electronic System

United States Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107
Via Court CM/ECF Electronic System



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